

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

PFIZER INC.,

Plaintiff,

v.

JOHNSON & JOHNSON and JANSSEN
BIOTECH, INC.,

Defendants.

Civil Action No.

17-cv-04180

**JANSSEN’S MOTION TO COMPEL PFIZER TO ADD FOUR DOCUMENT
CUSTODIANS AND FOR A RECIPROCAL LIMITED UPDATE OF THE PARTIES’
DOCUMENT PRODUCTIONS**

Pursuant to Federal Rule of Civil Procedure 37(a), Defendants Johnson & Johnson and Janssen Biotech, Inc. hereby respectfully move the Court for an order compelling Plaintiff Pfizer Inc. (“Pfizer”) to (i) produce responsive and non-privileged documents from the files of John Young, Berk Gurdogan, Ian Read, and Albert Bourla, and (ii) update its document collections and productions with respect to fifteen existing custodians and eight specific categories of non-custodial sources to encompass documents generated after Pfizer’s original collections in the summer of 2018. The facts and law in support of the motion and the specific relief requested are more fully set forth in the accompanying Memorandum of Law and the Declaration of Jonathan H. Hatch with its attached exhibits, all of which Defendants incorporate herein.

WHEREFORE, Defendants respectfully request that the Court enter the proposed Order granting Defendants’ motion.

Dated: August 23, 2019

Respectfully submitted,

/s/ Leslie E. John

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CERTIFICATE OF SERVICE

I hereby certify that on August 23, 2019, I electronically filed the foregoing motion using the CM/ECF system, which will send notification of such filing to all parties of record.

/s/ Leslie E. John